

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW HAMPSHIRE**

**MANIKANTA PASULA, LIKHITH BABU  
GORRELA, THANUJ KUMAR  
GUMMADAVELLI, HANGRUI ZHANG,**  
and **HAOYANG AN**, on behalf of themselves  
and all those similarly situated,

**Plaintiffs,**

**v.**

**U.S. DEPARTMENT OF HOMELAND  
SECURITY;**

**U.S. IMMIGRATION AND CUSTOMS  
ENFORCEMENT;**

**U.S. IMMIGRATION AND CUSTOMS  
ENFORCEMENT, BOSTON FIELD  
OFFICE;**

**U.S. IMMIGRATION AND CUSTOMS  
ENFORCEMENT, MANCHESTER SUB-  
FIELD OFFICE;**

**KRISTI NOEM, Secretary of the  
Department of Homeland Security;**

**TODD LYONS, Acting Director of the  
Immigration and Customs Enforcement;  
Defendants.**

No. 1:25-cv-156-SE-TSM

**PLAINTIFFS' ADDENDUM SUBMITTING ADDITIONAL EXHIBITS  
IN SUPPORT OF PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

Plaintiffs respectfully file this Addendum Submitting Additional Exhibits in support of Plaintiffs' Motion for Preliminary Injunction. The additional exhibits are as follows:

- Exhibit MM is an email from the Rivier University about the change of the SEVIS termination reasons from "OTHERWISE FAILING TO MAINTAIN STATUS" to "OTHER." The SEVIS record screenshot for the Rivier University students

including Plaintiff Manikanta Pasula and Plaintiff Likhith Gorrela. This is consistent with the SEVIS termination reason for Plaintiff Thanuj Kumar Gummadavelli. *Cf.* Docket Number (DN) 5-12 (Ex. I) at 3 ¶9; DN 5-13 (Ex. J).

- Exhibit NN is an updated expert declaration from Attorney Dahlia M. French. Attorney French added paragraphs 17, 18, and 19. Otherwise, the rest of the paragraphs are identical to the earlier declaration. *Cf.* DN 5-22 (Ex. S).
- Exhibit OO is a copy of the updated SEVIS record termination reason for Plaintiff Thanuj Kumar Gummadavelli. The April 9, 2025 updated SEVIS record termination indicates “OTHER – Individual identified in criminal records check and/or has had their VISA revoked. SEVIS record has been terminated.” Previously, the SEVIS termination reason included “Failure to Maintain Status . . . .” DN 5-13.
- Exhibit PP is a copy of Plaintiff Likhith Babu Gorrela’s Optional Practical Training (OPT) application and I-20 issued by Rivier University for his OPT application. Plaintiff Gorrela filed his OPT application with the United States Citizenship and Immigration Services (USCIS) to allow him to participate in the OPT after his May 20, 2025 graduation. It is currently pending.
- Exhibit QQ is a copy of another student’s notice of intent to deny the student’s application to change his status from F-1 student status to H-1B temporary worker. This evidence shows that USCIS—which is an agency within the Department of Homeland Security—construed the termination of a SEVIS record as the termination of “valid F-1 nonimmigrant status.” In this document at Ex. QQ, Defendant DHS terminated this F-1 student’s SEVIS record on April 10, 2025

based on criminal record checks and visa revocation. At that time, the F-1 student's employer's Form I-129—which was filed to seek to change the student's status from F-1 to H-1B (a temporary worker)—was pending before USCIS. In light of Defendants' termination of the F-1 student's SEVIS record on April 10, 2025—which was based on “the criminal records check and the revocation of their F-1 visa”—USCIS construed the SEVIS termination as the termination of the student's “F-1 nonimmigrant status[.]” Ex. QQ at 2.

- Exhibit RR is a copy of an email Xiaotian Liu, a Dartmouth student whose F-1 student status has been terminated, received from Dartmouth College, indicating that “schools have tried to request SEVIS data fixes (corrections) on these record terminations and SEVP is not entertaining those requests.”
- Exhibit SS is the affidavit of Hardik Gupta, a Dartmouth student who was on OPT prior to the SEVIS termination. In light of the SEVIS termination, Mr. Gupta has been on unpaid leave. His OPT will expire on June 30, 2025. As a graduate of a qualifying STEM (Science, Technology, Engineering, and Mathematics) field, he is eligible for the 24-month STEM OPT extension. However, the SEVIS termination prevents him from applying for the extension.

Plaintiffs and similarly situated members,

By and through their Counsel,

Dated: April 23, 2025

Respectfully submitted,

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*\* Application for admission pro hac vice  
forthcoming*